

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.;  
SPECTRUM ADVANCED SERVICES,  
LLC; and SPECTRUM MANAGEMENT  
HOLDING COMPANY, LLC,

Defendants.

Case No. 2:22-cv-00125-JRG

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

Pursuant to the Court's Order Granting Venue Discovery and Extension of Time to Respond to Charter's Motion to Dismiss (Dkt. 25) and the Court's Orders Granting Extension of Time (Dkts. 43, 47), the current deadline for the Parties to conduct venue discovery is December 9, 2022, and the current deadline for Plaintiff to respond to Charter's Motion to Dismiss for Improper Venue (Dkt. 18) is December 30, 2022. Plaintiff respectfully requests a brief extension of the venue discovery schedule so that the parties can complete venue depositions. The parties continued to engage in meet-and-confer to resolve disputes over the scope of the topics. Once they were resolved, two of Charter's three 30(b)(6) witnesses could not be made available for depositions until the week of December 12. Therefore, Plaintiff requests that the deadline for completion of venue discovery be extended through December 16, 2022 and the deadline for Plaintiff to respond to the Motion to Dismiss be extended through January 6, 2023. Defendants agree to this revised schedule and do not oppose this motion.

A proposed order is attached herewith.

Dated: December 2, 2022

Respectfully submitted,

/s/ James Shimota by permission Wesley Hill

James Shimota – LEAD ATTORNEY

Jason Engel

George Summerfield

Devon Beane

**K&L GATES LLP**

Suite 3300

70 W. Madison Street

Chicago, IL 60602

Tel.: (312) 372-1121

Fax: (312) 827-8000

jim.shimota@klgates.com

jason.engel@klgates.com

george.summerfield@klgates.com

devon.beane@klgates.com

Wesley Hill

Texas Bar No. 24032294

Andrea Fair

Texas Bar No. 24078488

**WARD, SMITH & HILL, PLLC**

1507 Bill Owens Pkwy

Longview, TX 75604

Tel: (903) 757-6400

Fax (903) 757-2323

wh@wsfirm.com

andrea@wsfirm.com

*Attorneys for Plaintiff Entropic  
Communications, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this 2nd day of December, 2022.

/s/ Wesley Hill

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies pursuant to Local Rule CV-7(h) that the relief requested in this motion is unopposed.

/s/ Wesley Hill